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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
DIVISION ONE

Casitas Del Sol Condominium Owners
Association, an Arizona corporation;

Plaintiff,

v.

State Farm Fire and Casualty Company, an
Illinois Corporation; John and Jane Does, I-X;
XYZ Partnerships, I-X; ABC Corporations, I-X,

Defendant.

Case No.

**STATE FARM FIRE AND CASUALTY
COMPANY'S NOTICE OF REMOVAL
OF ACTION**

TO: Clerk of the United States District Court for the District of Arizona:

Please take notice that Defendant State Farm Fire and Casualty Company ("State Farm") hereby removes to this Court the state court action described below:

1. Petitioner is a defendant in a civil action commenced and now pending in the Superior Court in Maricopa County, Arizona, entitled *Casitas Del Sol Condominium Owners Association vs. State Farm Fire and Casualty Company, a foreign corporation,*

1 Case No. CV2022-004452. A copy of the Complaint in this action is attached hereto as
2 Exhibit "A" and incorporated herein by this reference.

3 2. Within 30 days of this Notice of Removal of Action, Defendant received a
4 copy of the Summons and Complaint served upon it through the State of Arizona
5 Department of Insurance.

6 3. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b).

7 4. Defendant State Farm is a corporation incorporated in the State of Illinois
8 with its principal place of business in the State of Illinois.

9 5. Plaintiffs are individuals.

10 6. Jurisdiction is proper pursuant to 28 U.S.C. § 1332 in that diversity of
11 citizenship exists for the purposes of establishing federal jurisdiction.

12 7. Plaintiffs assert claims for insurance bad faith and breach of contract, and
13 pray for an award of punitive damages.

14 8. Defendant certifies that notice of this Removal has been filed with the Clerk
15 of the Superior Court of the State of Arizona, Maricopa County, as provided in 28 U.S.C.
16 § 1446(d).

17 9. True copies of all process, pleadings and orders which have been served or
18 filed in this case are attached hereto and filed herewith.

19 10. The undersigned has read this Notice of Removal and, to the best of the
20 undersigned's knowledge, information and belief, formed after reasonable inquiry, certifies
21 that Defendant's factual allegations have evidentiary support and its legal contentions are
22 warranted by existing law. The undersigned also certifies that this Notice of Removal is
23 not presented for any improper purpose, such as to harass or cause unnecessary delay or
24 needless increase in the cost of litigation.

1 RESPECTFULLY SUBMITTED this 25th day of April, 2022.

2 BROENING OBERG WOODS & WILSON, P.C.

3
4 By /s/ Jessica T. Kokal

5 Robert T. Sullivan
6 Jessica J. Kokal
7 Attorneys for Defendant

8 CERTIFICATE OF SERVICE

9 I hereby certify that on April 25, 2022, I electronically transmitted the attached
10 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a
11 Notice of Electronic Filing to the following CM/ECF registrants:

12 A courtesy copy with a copy of the Notice of Electronic filing was also
13 emailed/mailed on this same date at the following address:

14
15 Douglas F. Dieker
16 Dieker Copple, PLLC
17 14256 North Northsight Blvd., Suite 110
18 Scottsdale, Arizona 85260
19 douglas@diekercopplelaw.com

20
21 By /s/ Amy Ebanks